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REMARKS

Claims 1-28 are pending in the present application. Claims 1, 3, 4, 13, 19-21, and 28 were examined and stand rejected. With this response, claims 1, 13, 19 and 28 have been amended and no new matter is believed to added by the amendments to these claims. Support for the amendments may be found, for example, in FIGs. 1 and 2, and pages 5-8 of the present application. Applicants respectfully traverse the rejections and request reconsideration in light of the remarks to follow.

Applicants thank the Examiner for granting an interview with Applicant's representative on February 21, 2006. During the interview claims 1 and 19, the Kamp et al. and Tamura prior art references, and various proposed amendments to the claims were discussed, but no agreement was specifically reached at that time.

It is further noted that claims 2, 5-12, 14-18, and 22-27 were withdrawn from consideration as allegedly being drawn to a distinct species. Applicant again asserts that because all the independent claims, which are generic to all of the alleged species, are in condition for allowance as will be set forth more fully below, claims 2, 5-12, and 14-18 are allowable at least due to their dependence upon the allowable generic claims and should be rejoined.

Claims 19-21 and 28 are rejected under 35 USC §102(b) as being anticipated by Kamp (U.S. Pat. No. 4,899,025). The Applicant respectfully disagrees as follows.

Without repeating the arguments already provided in Applicant's previous response on September 16, 2005, Applicant still maintains these previous arguments. In response to these previously presented arguments and, in particular, to Applicant's statement that Kamp does not teach the claimed removably coupled power supply, however, the present Office Action asserts that Kamp is "definitely capable to removably couple the inductive coupling assembly 5, 7 to the power supply," citing col. 2, lines 35-55 and the sole figure in support. Applicant's reiterate that these cited portions of Kamp, however, actually do not teach removable coupling of the coils 5, 7 to the power supply 1. Rather, this portion of the Kamp patent actually teaches the contrary by stating that the "the secondary winding 13 [of the power supply 1] is formed by a single conductor . . . connected to the induction coils 5 and 7 via the supply lines 11." (See col. 2, ll. 54-56). Thus, the coils 5 and 7 are permanently, not removably, coupled to the power supply 1.

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Further in response to Applicant's arguments, the Office Action appears to make a second argument that the language of Applicant's claims also does not explicitly claim removable coupling of the primary and secondary coils through the inductor core (i.e., magnetically coupled) and, thus, Kamp anticipates the claim language. In particular, the Office Action states that "[a]s for claim 19, Kamp meets the claim limitations because 'magnetically coupled' is not defined in the claim by being permanent [sic] or temporarily magnetically coupled." Additionally during the interview with the Examiner, it was asserted that the present specification does not teach temporal magnetic coupling. Applicant respectfully, but strongly disagrees with this assertion for the following reasons.

First, originally presented claim 19 stated that "the power supply being electrically coupled to the primary coil, the secondary coil being electrically coupled to the work head, the primary and secondary coils configured to be magnetically coupled through the inductor core when the inductive coupling assembly is coupled." Additionally original claim 19 further explicitly stated that the inductive coupling assembly is "configured to removably couple the power supply to the work head." Thus, the magnetically coupling of the primary and secondary coils is selective coupling because it occurs "when the inductive coupling assembly is coupled." Thus, to assert that "magnetically coupled" is not linked to a temporal aspect (i.e., "when the inductive coupling assembly is coupled") is incorrect and does not properly consider the claim language in its context.

Furthermore, FIG. 1 and the accompanying text clearly describe to one skilled in the art that the cable assembly 24 is capable of being selectively coupled to the power supply 22. In particular, lines 3-4 of page 6 of the application explicitly state that the inductive coupling assembly 30 is configured to removably couple the cable assembly 24 to the power supply 22 with the coupling sleeve 34, as an example. Moreover, lines 2-3 and 4-8 of page 6 teach an example where the primary coil 32 is electrically connected to power supply 22, and the secondary coil 36 is "positioned adjacent the first end of the cable assembly 24 such that the primary coil 32 and the secondary coil are aligned about an inductor core 38 when the inductive coupling assembly 30 is coupled to the power supply 22." Although the Examiner, during the Examiner's interview, argued that this latter statement does not teach that the secondary coil is removeable, lines 15-16 of page 6 further teach that as a result of a selective magnetic coupling

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of the core 38 and secondary coil 32, power is delivered to the workhead 40. Thus, one skilled in art would recognize that the secondary coil 32 is electrically connected as part of cable assembly 24 and would be removeable and capable of being removeably coupled with the primary coil 32. Furthermore, the examples of FIGs. 2-8 also evince examples of a cable assembly including a secondary coil that is removeable with the cable assembly. Accordingly, Kamp does not teach the subject matter disclosed and originally claimed in the present application.

Moreover, this second argument, taken in the context of the arguments presented, seems to contradict the first assertion that Kamp "definitely" teaches removable coupling of an inductive coupling assembly to a power supply thereby anticipating the claims. This is because the second assertion then presumes, falsely, that the claim language does not define selective coupling (e.g., temporary magnetic coupling) and asserts that Kamp thus teaches the claims, thereby implying the Office's position is now taking Kamp to teach permanent or fixed coupling, which would putatively meet the claims. Even assuming that the Office Action's intent here is to provide an alternate argument, rather than a logically contradictory argument, Applicant still asserts that in either case, Kamp does not in any way teach or suggest that the primary and secondary coils of Kamp (24 & 13) are magnetically coupled with an inductive coupling assembly that selectively couple through an inductor core of the assembly when the coupling assembly is coupled.

In the response to Applicant's arguments, the Office Action also asserts that the cathode ray tube 4, which is equated with a "work piece," is coupled to the power supply through supports 9 and 10 holding the getter to be evaporated and deposited within the tube 4. Although the supports 9 and 10 are inductively heated by inductors 2 and 3, and could arguably be equated to the claimed "work head," this application of Kamp still does not anticipate all of the claimed elements. The supports 9 and 10 are magnetically coupled to inductors 2 and 3, but the secondary coil (either coil 13 or 5 and 7) is not electrically coupled to the supports or the tube 4. Thus, the teachings of Kamp still fall short of the claimed term "the secondary coil being electrically coupled to the work head." Also of note here, the claim language further distinguishes electrical coupling and magnetic coupling, so it cannot be said that supports 9 and 10 are "inherently" electrically coupled, when they are in fact only magnetically coupled.

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Finally, claim 19, as amended (although commensurate in scope with original claim 19), features that "the inductive coupling assembly is configured to removably couple the power supply to the work head by selective magnetic coupling of the primary coil to the secondary coil through the inductor core." Kamp et al., as argued above, simply does not teach or suggest removeable coupling of the power supply including selective magnetic coupling of the primary and secondary coils. The primary and secondary coils of Kamp (24 and 13) are fixedly coupled. Moreover, coils 7 and 13, if argued as secondary and primary, are still taught by Kamp to be fixed coupled, not selectively coupled. Accordingly, claim 19 is believed to be allowable over Kamp.

In light of the above comments, the Applicant respectfully submits that claim 19 is not anticipated or obvious in view of the teachings of Kamp.

Dependent claims 20 and 21 depend from claim 19 and are thus also allowable for at least the same reasons presented above and also on their own merits. Additionally, Kamp does not teach or suggest that the cores 6 and 8, if argued as equivalent elements, are attached to coils 5 or 7, but rather are moveable or adjustable therein. Thus, Kamp would not teach the claimed elements. Furthermore, withdrawn dependent claims 22-27, which also depend from allowable claim 19, are also believed to be allowable for at least the same reasons and should be rejoined for examination on that basis.

With respect to independent claim 28, the Office Action asserts that Kamp discloses all of the elements of this claim. Applicant respectfully disagrees. Claim 28 features, among other things, "a cable assembly having a first end electrically coupled to a secondary coil and a second end coupled to a work head; an inductor core; and means for removably coupling the cable assembly to the power supply such that the inductor core couples between the primary coil and the secondary coil." The Office Action equates the supply lines 11 of Kamp with the claimed "cable assembly" and the transformer core 12 with the claimed "inductor core." The Office Action then asserts that the coils 5, 7 of Kamp are equivalent to the claimed "means for removably coupling the cable assembly to the power supply." As discussed previously, however, the primary coil 24 of Kamp is permanently coupled to the wire 11 and coils 5, 7 through the transformer with primary coil 24, secondary coil 13, and core 12. Kamp does not disclose in any way removably coupling the supply lines 11 or secondary coil 13 to the power supply 1, namely

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the transformer core 12. Accordingly, Applicant submits that Kamp does not disclose or suggest all of the elements of claim 28 and that this claim is therefore allowable over Kamp.

Claims 1, 3, 4, and 13 were rejected under 35 USC §103(a) as being unpatentable over Kamp in view of Tamura (US Pat. Pub. 2001/039137). Applicant respectfully traverses this rejection for the following reasons.

The present Office Action rejected claim 1 by asserting that Kamp discloses all of the elements except for the claimed "inductive coupling sleeve." The Office Action then asserts that Tamura teaches this element and that it would have been obvious to modify Kamp to include a protective sleeve as taught by Tamura "as reasonably pertinent to the particular problem of facilitating the assembly of the inductive heating device in according with MPEP 2141.01(a)." Applicant respectfully disagrees.

First, Tamura teaches a high voltage connector (e.g., a plug 25) that is normally used for connecting a conductor core 21 to another cable. Tamura includes a sheath 1 to protect the plug 25 and a conductor 3 in the sheath 1 to effect short circuiting of the conductor core 21 to a "sleeve" 23, which is actually shielding 23, such as that used in coaxial cables. This short-circuiting ensures no static charge is accumulated when the high voltage conductor is off. (See col. 2, ¶ 0026). Thus, Tamura does not teach an "inductive coupling sleeve" as featured in claim 1, but rather merely is teaching a protective sheath 1 that effects short circuiting between a conductor core and a shield of the conductor. As argued previously and recognized in the Office Action, Kamp further does not teach or suggest the claimed "sleeve." Further, Kamp and Tamura also fail to disclose "an inductive coupling sleeve having a secondary coil positioned therein and electrically coupled with the cable assembly" as featured in amended claim 1. Accordingly, the §103 rejection is believed to be untenable as all of the claimed elements are not taught by the combination of the cited references.

Claim 1 also features "the inductive coupling assembly . . . configured to removably couple the cable assembly to the power supply in inductively coupling the inductor core between the primary coil and the secondary coil." As argued previously with respect to claim 19, Kamp does not teach or suggest removably coupling a work head (or a cable as featured in claim 1) to the power supply and inductively coupling the inductor core between the primary and second coils. Rather, the primary coil 24 and secondary coil 13 (and accompanying supply lines 11) in

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power supply 1 are permanently coupled. Tamura also does not teach or even suggest a removable inductive coupling as featured in the claim. Accordingly, Kamp and Tamura, either separately or combined, additionally fail to teach or suggest this claimed element.

Furthermore, the above teachings of Tamura relate to a protective, short-circuiting sheath. This teaching in no way is "reasonably pertinent to the particular problem of facilitating the assembly of the inductive heating device" as alleged in the Office Action. Accordingly, even motivation to combine these references is lacking and does not comport with cited section 2141.01(a) of the MPEP, because providing a short-circuiting, protective sheath for a plug is not reasonably pertinent to the problem of providing a removable inductive coupling.

In light of the foregoing comments, claim 1 is submitted to be allowable over Kamp and Tamura, either taken singly or in combination.

Dependent claims 3 and 4 depend from claim 1 and are also believed to be allowable for at least the same reasons and also on their own merits. Furthermore, claim 1 is generic to withdrawn claims 2 and 5-12 and these claims should be rejoined for examination based on the allowability of claim 1.

With respect to independent method claim 13, this claim features, among other things, "coupling a sleeve disposed at a first end of cable assembly to the power supply, where the sleeve includes a secondary coil and a second portion of inductor core, such that the first and second portions of the inductor core inductively couple." As argued above, neither Kamp or Tamura teach or suggest the coupling of a sleeve with a power supply. Moreover, the cited references do not teach or suggest a cable assembly with a sleeve disposed at one end thereof having a secondary coil and a portion of an inductor core. The Office Action also has not affirmatively pointed out how the combination of Kamp and Tamura could disclose this claimed feature. Accordingly, claim 13 is submitted to be allowable over Kamp and Tamura because the references do not teach or suggest all of the elements of the claim, either taken singly or in combination.

Claim 13 is generic to withdrawn claims 14-18 and these claims should be rejoined for examination based on the allowability of claim 13 accordingly.

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In conclusion, Applicant respectfully submits that claims 1-28 are in condition for allowance and requests that a Notice of Allowance be issued in this case. Should the Examiner have any questions, please contact the undersigned.

Respectfully submitted,

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Date

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